

Exhibit 17

1 A That's correct.

2 Q Okay. What we're going to do now is
3 we're going to put on the screen and mark for
4 identification as Exhibit-6 documents which
5 internally we have identified as MM, Mary Mary,
6 which we call discovery in federal court Baila's
7 answers to rogs and docs. That's just lawyer talk
8 for how we're identifying the document. And then
9 I'll ask you some questions about it, okay?

10 (Whereupon, Exhibit Sebrow-6, answers
11 to interrogatories, was marked for
12 identification.)

13 Q If it is necessary for you to go
14 closer to the screen so that you can read things
15 more easily -- or you want us to enlarge it?

16 A If you can enlarge it.

17 Q What I'm going to do is, I am going to
18 ask you to take a look at what's on the screen so
19 far and I'm going to ask you what you have there is
20 what lawyers called a caption and then on the right
21 you have the case number and you have the heading
22 called Defendant's Response to Plaintiff's First Set
23 of Interrogatories.

24 Do you see that?

25 A Yes.

1 Q Have you ever seen that before?

2 A No.

3 Q Let's go to the --

4 MR. BORENSTEIN: Scroll down, please.

5 Share the whole page as much as you can there.

6 Q You have all this material on the
7 first page which has number one through five.

8 Have you ever seen that before?

9 A No.

10 Q Let's go to the second page. Which is
11 page two. Doesn't have a page number but it's item
12 six through fifteen.

13 Have you ever seen that before?

14 A No.

15 Q Let's go to the next page. Which
16 continues with items sixteen through nineteen. And
17 then in the middle of the page it says responses and
18 objections.

19 Have you ever seen that before?

20 A No.

21 Q Let's go all the way down to one, two
22 and three. You see there are three answers to
23 interrogatories. Did you see that? Scrolling?

24 A I see it on the screen, yes.

25 Q Okay. Let's go to the next page. It

1 says interrogatory four, interrogatory five,
2 interrogatory six, and part of interrogatory number
3 seven. Do you see that now?

4 A Yes.

5 Q Have you ever seen that before?

6 A No.

7 Q Let's continue to the next page. It
8 says interrogatory eight, interrogatory nine,
9 interrogatory ten, interrogatory eleven,
10 interrogatory twelve, interrogatory thirteen.

11 Have you ever seen that before?

12 A No.

13 Q Let's go to the last page which says
14 interrogatory fourteen, interrogatory fifteen,
15 interrogatory sixteen, interrogatory seventeen,
16 interrogatory eighteen, interrogatory nineteen.

17 Have you ever seen those before?

18 A No.

19 Q Do you see that it's dated January 5,
20 2023?

21 A Yes.

22 Q And do you see that on the right is
23 Ira W. Heller, Esquire's name?

24 A Yes.

25 Q Did you ever see Mr. Heller sign his

1 name to the document?

2 A Have I ever seen his signature?

3 Q Did you see him sign? Physically see
4 him sign?

5 A I don't recall.

6 Q Did you personally ever read this
7 entire document called Defendant's Response to
8 Plaintiff's First Set of Interrogatories at any
9 time?

10 A No, sir, I have not seen this
11 document.

12 Q Do you understand that this document
13 represents your answers to questions that were posed
14 by the attorneys for the Plaintiff John Doe in this
15 case?

16 A Can you repeat that question.

17 Q Sure. I'll ask the court reporter to
18 read it back.

19 (Whereupon, the last question was
20 read back by the reporter.)

21 A The questions today?

22 Q Questions in writing which were sent
23 --

24 A I haven't read the whole thing. You
25 went through it quickly but I -- not really sure how